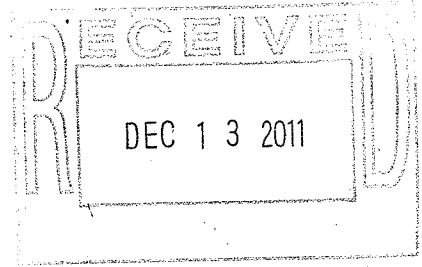


deckers
OUTDOOR CORPORATION

angel martinez
president and ceo



December 12, 2011

Office of the Secretary
Public Company Accounting Oversight Board
166 K Street, NW
Washington, D.C. 20006-2803

Subject: Docket 037: Concept Release on Auditor Independence and Audit Firm Rotation

Dear Board Members and Staff of the PCAOB:

I am a member of the board of directors of Tupperware Brands Corporation, and am writing to comment on your recent concept release and in particular on audit firm rotation. I do not believe that such rotation should be mandated. While I believe that some improvements to the audit process may be possible in the context of independence, objectivity, and professional skepticism, I do not believe the proposed changes in the Concept Release would meet the objectives as stated. Particularly, I believe mandatory audit rotation is unwarranted, cost prohibitive, and may actually be counter-productive to the stated objectives. I say this because -

- Financial Statements are the responsibility of management and their judgments should not be superseded by those of the auditor;
- The current professional, regulatory, and enforcement environment is well positioned to meet the objectives stated in the Concept Release;
- The audit process is costly and time consuming for all entities, particularly for a multi-national company as diverse and complex as Tupperware. A new audit team would face a steep learning curve that would be disruptive to the on-going operations of the Company and could actually result in a lower quality audit due to the lack of historical perspective. The current requirement for periodic partner rotation provides a fresh view while retaining the benefit of company specific experience within an audit team. This would be lost if the firm itself were systematically changed.
- The total costs of the audit would escalate significantly and the Company would bear the entire cost. I do not believe that any benefit of mandatory audit firm rotation would exceed the cost.

I believe the current system in place with the checks and balances of professional standards, regulatory oversight, and enforcement actions provides the best way to provide the investing public with the right financial information needed for investing decisions. The current process does not eliminate all risk, and of course there is no system or framework that will ever eliminate all risk. However, the ideas promoted in the Concept Release do not seem to be based on fact or quantitative data. The current system could best be improved by strengthening the infrastructure in place and not through starting over. Thus, in terms of improving auditor independence, objectivity and professional skepticism, I do not believe mandatory audit rotation, or any of the other whole-sale changes proposed, represents a warranted, cost effective, or even effective change to the current model.

Regards,

A handwritten signature in black ink, appearing to read "Angel Martinez".

Angel Martinez
Chairman, President & CEO

